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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 MARIA JONI MCKELLAR,

10 Plaintiff,

11 vs.

12 WALMART STORES INC., #1584, a Foreign  
13 Company; DOES I through X, inclusive and  
14 ROE BUSINESS ENTITIES I through X,  
inclusive,

15 Defendants.

CASE NO. 2:22-cv-0651-APG-DJA

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO RESPOND TO  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT (ECF No. 15)**

**(First Request)**

16 IT IS HEREBY STIPULATED by and between Plaintiff, MARIA JONI MCKELLAR  
17 ("Plaintiff"), and Defendant, WALMART STORES INC. #1584 ("Defendant"), by and through  
18 their respective, undersigned counsel of record, that the deadline for Plaintiff to file a response to  
19 Defendant's Motion for Summary Judgment (ECF No. 15), be extended from March 14, 2023 to  
20 April 14, 2023.

21  
22 This extension of time is being jointly requested by the parties, and is specifically being  
23 sought for two reasons. First, this extension is sought to afford the parties additional time to  
24 resolve a lingering evidentiary dispute, which may bear relevance on the parties' summary  
25 judgment arguments. The parties are working together on this issue conscientiously and in good  
26 faith, and anticipate resolving the same in the immediate future. Second, the parties are engaged  
27 in continuous, progressive settlement discussions, and believe a global resolution of this matter  
28

may be shortly attainable. The parties further agree these discussions may be hampered by the current briefing schedule on Defendant's Motion for Summary Judgment. However, the parties will proceed with the remaining summary judgment briefing if this matter cannot be settled within the next two weeks. As such, the parties do not anticipate pursuing any further extensions of the summary judgment briefing schedule.

Accordingly, the parties jointly and respectfully submit there exists good cause for the extension of time sought herein. This request is not being sought for reasons of undue delay or any other untoward purpose.

**IT IS HEREBY AGREED AND STIPULATED.**

DATED this 8th day of March, 2023.

DATED this 8th day of March, 2023.

**LADAH LAW FIRM**

**ALVERSON TAYLOR & SANDERS**

*/s/ Ramzy P. Ladah, Esq.*

*/s/ Madison M. Aguirre, Esq.*

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*Attorneys for Defendant*

**ORDER**

Based upon the Stipulation of the parties, the Court having reviewed all pleadings and papers on file herein and good cause appearing:

**IT IS HEREBY ORDERED** that the deadline for Plaintiff to file a response to Defendant's Motion for Summary Judgment (ECF No. 15) is extended to Friday, April 14, 2023.

**IT IS SO ORDERED.**

By

  
UNITED STATES DISTRICT COURT JUDGE

DATED: March 9, 2023

